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REMARKS

1. Examiner Interview

Applicants note with appreciation the telephonic interview conducted between Applicants' patent agent, Scott Schmok, and the Examiner on June 16, 2003. During the telephonic interview, Applicants' patent agent averred that the prior art reference cited (Paterson et al., U.S. Patent No. 6,078,739 and Sawada et al., U.S. Patent No. 6,476,821) in the Examiner's § 103 rejection on Applicants' independent claim does not teach displaying objects with display attributes that correspond to a layer.

Applicants' patent agent discussed portions of the '739 reference with the Examiner and explained that Paterson teaches a method of selecting particular parameter values corresponding to an object whereby the selected parameter values are used for a computer simulation. Importantly, the '739 reference in view of the '821 reference do not teach nor suggest, in whole or in part, displaying objects with display attributes that correspond to a layer.

Examiner requested clarification of the relationship between the reference numerals in Figure 1 and the reference numerals in Figure 2. Applicants reference page 12, lines 17-26 of Applicants' application stating:

"Figure 2 shows an example of a layered system view showing software components on the first layer and hardware components on the second layer within display window 200. The reference numerals used in Figure 2 correspond to identify objects in Figure 1. For example, hub 109 in Figure 1 corresponds to hub 209 in Figure 2, computer system 115 in Figure 1 corresponds to computer system 215 in Figure 2, application 151 corresponds to application 251, data store 172 in Figure 1 corresponds to data store 272 in Figure 2, etc."

Examiner further requested the further limitation of the "identifying" element and an "object" in claim 1. As described in detail below, Applicants assert that the '739 reference in view of the '821 reference do not teach nor suggest, in whole or in part, displaying objects with display attributes that correspond to a layer and, therefore, additional limitation on claim 1 is not required.

2. Summary

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Claims 1-20 are currently pending in the application. Claims 1, 9, and 13 are independent claims. Claims 1, 9, and 13 have been amended. No claims have been canceled or added. Reconsideration of the claims is respectfully requested. No new matter has been added by any of the amendments to the claims.

3. Claim Rejections 35 U.S.C. § 103

Claims 1-20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,078,739, to Paterson et al. (hereafter "Paterson") in view of U.S. Patent No. 6,476,821 to Sawada et al. (hereafter "Sawada"). Applicants respectfully traverse these rejections.

Paterson teaches a method of selecting particular parameter values for a particular object whereby the selected parameter values are used for a computer simulation. Specifically, Paterson teaches "methods of representing, accessing, inputting, and monitoring parameters of objects within a simulation model" (col. 1, lines 25-27). In contrast, Applicants claim "displaying objects with ...display attributes."

Sawada teaches a method of "changing a display attribute of a specific area on the display screen" (abstract) whereby Sawada teaches throughout that a "specific area" is a window (Figures 8 through 12 and corresponding text). Furthermore, Sawada shows that information that is used for changing a specific area display attribute includes the number of windows for a particular area (Table 2, col. 18, lines 5-40). In the case where Sawada teaches that the "specific area" is other than a window, such as an "arbitrary shape," Sawada teaches that in order to handle an arbitrary shape that "a bit pattern ...and a start address are generated" (col. 20, lines 35-37). In contrast, Applicants claim "applying the display attributes...for each ...object" and "displaying objects with ...display attributes".

Specifically, Examiner rejects claim 1 using Paterson and Sawada as follows:

- i. Examiner cites that Paterson "illustrates in Fig. 18, in at step 360, and in response to the user identification of parameters at step 358, object and parameter identifiers, and

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the first values for the selected parameters, are displayed within the layer panel" (col. 17, lines 52-56). Upon review, Applicants assert that Paterson selects parameters and displays the selected parameters that correspond to a particular object. In contrast, Applicants' invention "select[s] ...objects", and "display[s] the objects...with the display attributes". Neither Paterson nor Sawada, in whole or in part, teach or suggest displaying objects with display attributes.

- ii. Examiner cites that Paterson "illustrates in Fig. 15 is a diagrammatic representation of a baseline foundation, a baseline layer, and three alternative layers which may be substituted for the baseline layer". Examiner further cites that Paterson "illustrates in Fig. 3 each of the layer panels represents an underlying layer object". Upon review, Applicants assert that Paterson uses layers that correspond to an object's parameters for use in a computer simulation. Specifically, Paterson states "In order to allow a user conveniently to substitute one scenario within the simulation model with another...a modeler can create groupings of parameter "aliases" which may conveniently termed "layers". Each layer comprises a set of parameter values that may be substituted for a set of parameter values within the baseline foundation" (col. 16, lines 14-22). In contrast, Applicants' invention uses the layers to "match each of the objects to ...the layers". Neither Paterson nor Sawada, in whole or in part, teach or suggest matching an object with layers.
- iii. Examiner cites that Paterson "illustrates in Fig. 12 is a flowchart illustrating a method, according to one embodiment of the invention, of displaying a modifier representation which represents the influence of an object on a relationship condition between a pair of objects." Upon review, Applicants are confused by the Examiner's statement, as claim 1 does not include a limitation of "displaying a modifier representation which represents the influence of an object on a relationship condition between a pair of objects."

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iv. Examiner admits that "*Paterson does not specify the display attribute,*" however the Examiner contends that Sawada "*teaches in (col. 2, lines 29-36) of displaying data with a display attribute varying area to area on the display screen of the image displaying apparatus..*" Upon review, and as discussed above, Applicants assert that the "area" taught throughout Sawada is a window (Figures 8 through 12 and corresponding text). Furthermore, Sawada shows that information that is used for changing a specific area display attribute includes the number of windows for a particular area (Table 2, col. 18, lines 5-40). In the case where Sawada teaches that the "specific area" is other than a window, such as an "arbitrary shape," Sawada teaches that in order to handle the arbitrary shape "a bit pattern ...and a start address are generated" (col. 20, lines 35-37). In contrast, Applicants claim "applying the display attributes...for each ...object" and "displaying objects with ...the display attributes". Neither Paterson nor Sawada, in whole or in part, alone or in combination with one another, teach or suggest displaying objects with display attributes.

Therefore, for at least the aforesaid reasons, the references, alone in combination, do not teach or suggest all the limitations of claim 1. Thus, Applicants respectfully assert that a *prima facie* case of obviousness has not been made with respect to claim 1. Therefore, the rejection of claim 1 has been traversed and claim 1 is allowable under 35 U.S.C. § 103 over the combination of Paterson and Sawada.

As described above, Paterson teaches using parameter values used in computer simulations, while Sawada teaches a way of changing a display attribute for an area on a display screen. Therefore, the motivation to combine the computer simulations of Paterson with the display screen alterations taught by Sawada is not sufficient to establish a *prima facie* showing of obviousness. Throughout the Office Action, the Examiner concludes, without more, that it would have been obvious to combine the simulation teachings of Paterson with the display alteration techniques taught by Sawada. Neither is there such a suggestion to combine the teachings of Paterson with those of Sawada in the references themselves, nor is there such a suggestion in the knowledge of those of ordinary skill in the art, or the nature of the problem to be solved as evidenced by the teachings in Paterson and Sawada. Thus, a motivation or

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suggestion to modify or combine the references is not found in one of the three possible sources thereof. See MPEP § 2143.01 (stating that the suggestion or motivation for combining or modifying a reference must be found in the references themselves, the knowledge of persons of ordinary skill in the art, or the nature of the problem to be solved).

Additionally, there must be some reasonable expectation of success in combining the references to make the invention of claim 1. MPEP § 2142. The reasonable expectation of success must be found in the references themselves. Id. No reasonable expectation of success has been identified in either Paterson or Sawada. Furthermore, in light of Paterson's teachings of computer simulation and Sawada's teachings of altering display attributes for a window, no reasonable expectation would be anticipated.

Claims 2 through 8 are dependent upon claim 1 and therefore are allowable for at least the same reasons as claim 1 as described above. Claim 9 is an information handling claim including the same limitations as set forth in claim 1, so rejections to claim 9 are traversed for the same reasons set forth above for claim 1. Claim 13 is a computer program product claim including the same limitations as set forth in claim 1, so rejections to claim 13 are traversed for the same reasons as claim 1. Claims 10-12 are dependent claims of claim 9 and therefore are allowable for at least the same reasons as claim 9 is allowable. Claims 14 -20 are dependent claims of claim 13 and therefore are allowable for at least the same reasons as claim 13 is allowable.

CONCLUSION

As a result of the foregoing, it is asserted by Applicants that the amended claims in the Application are in condition for allowance, and Applicants respectfully request an early allowance of such claims.

Applicants respectfully request that the Examiner contact the Applicants' attorney listed below if the Examiner believes that such a discussion would be helpful in resolving any remaining questions or issues related to this Application.

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